

ID: CCA_2011032209060537

Number: **201116020**

Office:

Release Date: 4/22/2011

UILC: 6224.01-01

From:

Sent: Tuesday, March 22, 2011 9:06:10 AM

To:

Cc:

Subject: RE: TEFRA partnership question

A settlement agreement by a pass-thru partner (i.e., a tier) binds the tier's partners. I.R.C. 6224(c)(1), last sentence. So each tier will need to enter into the closing agreement under your facts.